



829 NE Eighth Street • Gresham, OR 97030 • P 503.667.8848 • www.metroeast.org

1 August 2013

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)*

Dear Commissioners:

MetroEast Community Media submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

MetroEast Community Media provides public, education and government access on eight channels for five jurisdictions east of Portland Oregon. We carry more than five hundred hours of local programming each week. Depending on the channel, our programming is available to between 35,000 and 300,000 subscribers in the greater Portland area.

We carry the programs local government meetings, *Classic Arts Showcase*, and NASA which includes closed captioning on our channels. The onscreen video programming guide of our multichannel video programming distributor (MVPD), Comcast does not provide a label or symbol indicating that these have closed captions.

We have program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions. However, currently, Comcast and Frontier usually provide only generic information – e.g., “government meeting” or “education programming” or “local programming” – about MetroEast programming. This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). We have had periodic discussions with our MVPDs over the years about the information they provide (or don’t provide) with only limited success. Viewers cannot determine from the MVPD’s video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level



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channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Robert Brading

Chief Executive Officer

MetroEast Community Media